

## **EXHIBIT B**

IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY

CYNTHIA HANSEN, a single person,

Plaintiff(s)

vs.

HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY,

Defendant(s)

Case No. \_\_\_\_\_

**PETITION AT LAW AND JURY DEMAND**

COMES NOW, the Plaintiff, CYNTHIA HANSEN, and for her cause of action, states as following:

1. Plaintiff is CYNTHIA HANSEN, and she has resided in Polk County, Iowa at all times material hereto.

2. Defendant is Hartford Life and Accident Insurance Company.

3. Defendant, HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY, is a company licensed in the State of Iowa to sell and service disability insurance policies. Plaintiff was an insured under a disability insurance policy issued by Defendant that promised to pay medical and wage loss benefits, in the event Plaintiff was injured.

4. Plaintiff was injured and was qualified under the definitions of Defendant's policy to receive medical and income continuation benefits. However, Defendant wrongfully denied

payment for benefits. Plaintiff has performed all condition precedent to payment of benefits or they have been waived by Defendant.

5. Defendant has wrongfully, recklessly, and willfully denied benefits, and knew or should have known its denial would cause financial harm to the Plaintiff.

6. The amount in the dispute meets or exceeds the jurisdictional minimum amount of the Iowa District Court.

7. Plaintiff requests an award of compensation and punitive damages. As a proximate result of Defendants wrongful denial of Plaintiff's claim she has suffered emotional distress and has incurred financial expenses and liabilities.

WHEREFORE the Plaintiff prays for a judgment in an amount that will compensate her for her injuries and damages and for an amount for punitive damages sufficient to discourage Defendant's willful and reckless conduct and for interest and costs provided for by law.

## JURY DEMAND

Plaintiff hereby demands a trial by jury in the above entitled cause.

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Respectfully submitted,

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